

Missouri's Emissions Inventory (EIQ) Reporting Requirements

MDNR/APCP

BACKGROUND

- Each year, APCP collects emission inventory (EIQs) from all industrial sources for the purposes of permit review, modeling, annual inspection, compliance determination, SIP control strategy, rule developments, fees assessment, federal emissions reporting, etc.

Goals for EIQ Reporting

- To facilitate EIQ submittal and improve quality of emissions data (QA).
 - MOEIS on-line
 - Fill-in MS Word forms
 - MoERT tool
- To simplify the EIQ reporting process.
 - increased EU reporting threshold limits
 - developed 1-page Form EZ
 - propose 3-year reporting for small sources

CERR

- In 2002, EPA promulgated the Consolidated Emission Reporting Rule (CERR) which simplifies reporting, and unifies reporting dates for various categories of emission sources.
- States are required to submit two types of inventories referred to as an annual inventory and a 3-year cycle inventory.
 - Large point sources annually.
 - All point, area, and mobile sources every third year.

DEFINITIONS

- **P70** = Any facility with potential to emit greater than 100 tons per year of any criteria pollutants, or 10/25 tpy of HAPs.
- **Intermediate** = Any facility that has potential to emit greater than 100 tpy but accepted an emission limit of less than 100 tons.
- **Basic** = Any facility with potential to emit greater than *deminimis* levels but less than 100 tons potential.
- **DemPAL (NOP)** = No operating permit required. Permit limits actual emissions to be below *deminimis* levels:
 - PM₁₀ = 15 tons, SO_x, NO_x, VOC = 40 tons, CO = 100 tons,
 - Lead = .6 tons, HAPs = 10 tons each/25 tons combined.

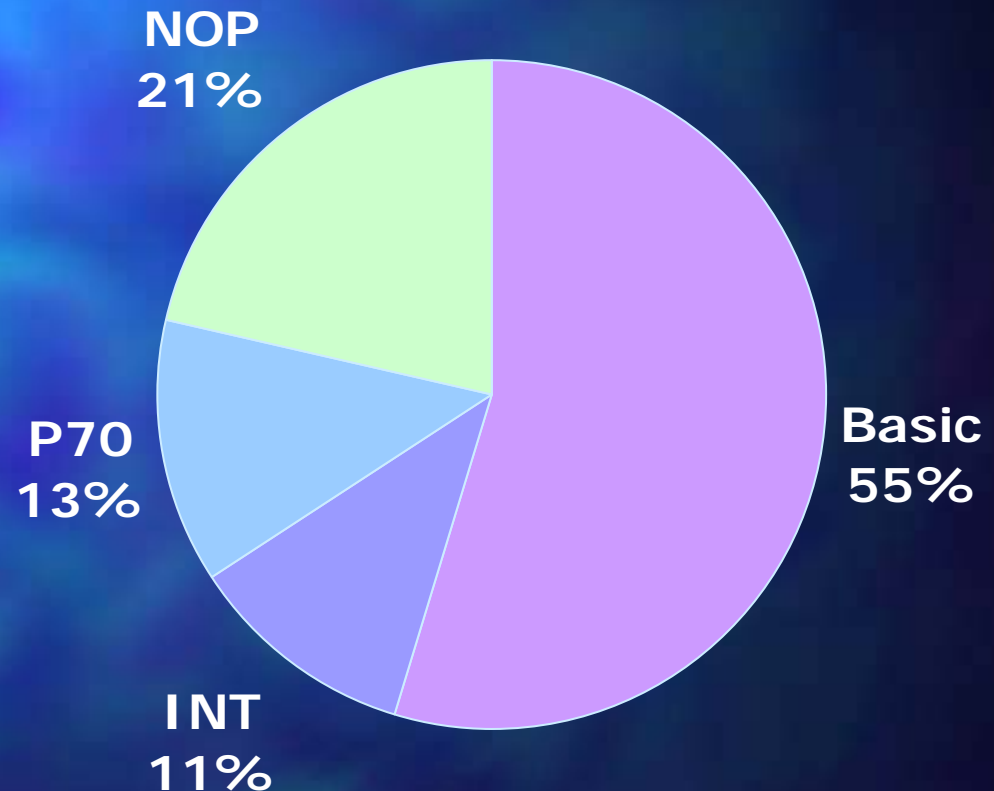
EIQ Facilities by Type

■ P70 - 335

■ Intermediate - 290

■ Basic - 1413

■ NOP - 550



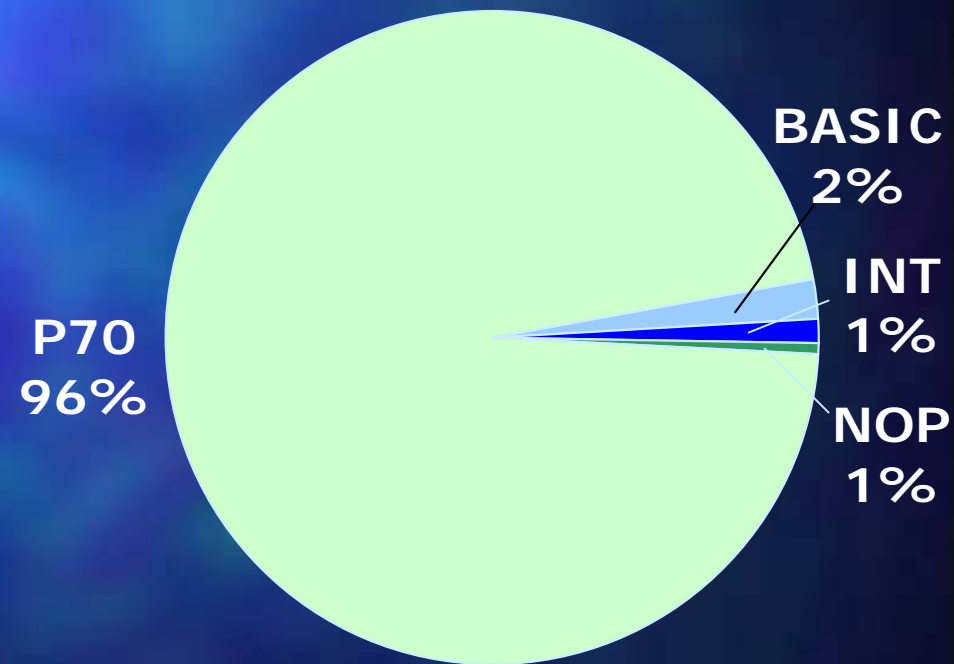
2004 Emissions by Type

■ P70 = 631,400 tons

■ INT = 7,500 tons

■ BAS = 12,600 tons

■ NOP = 4,300 tons



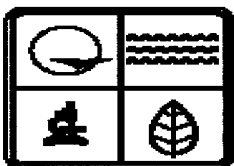
APCP PROPOSAL

Current Reporting Requirements	New Reporting Requirements
<ul style="list-style-type: none">• P70, Intermediate and Basic facilities report annually	<ul style="list-style-type: none">• P70 and Intermediate facilities report annually
	<ul style="list-style-type: none">• Basic facilities report every three years*
<ul style="list-style-type: none">• NOP facilities report every five years	<ul style="list-style-type: none">• Every 6 years*

* some basic facilities may still be required to submit an EIQ annually subject to federal rules, i.e. NOx SIP, MACTs, etc.

APCP PROPOSAL (Continued)

- During off years, facilities will submit a Fee-only Form and pay fees based on the last reported full EIQ (unless the production increase or decrease by 10 tons.)
 - Example 1: A facility reported a full EIQ in 2005 (EPA tri-annual reporting year), in 2006 and 2007 they would submit a Fee-only Form and in 2008 another full EIQ.
 - Example 2: If a facility was issued a Basic Permit in 2005, they would submit a Full EIQ in 2006, a Fee-only Form in 2007 and a full EIQ in 2008.

**STATE OF MISSOURI**

Department of Natural Resources
Air Pollution Control Program
1101 Riverside Drive, P.O. Box 176
Jefferson City, MO 65102

SAMPLE**Emissions Inventory Questionnaire (EIQ)****FORM 1.0 FEE ONLY**

Facility Name HUM DINGER FINISHING QUAIL PATH PLANT		FIPs County No. 987	Plant No. 1234	Reporting Year 2005
Facility Street Address 4420 QUAIL PATH		County Name AVIARY	Region AARO	Class NOP-DeMPAL
City PIN OAK	ZIP Code 63010	Parent Company Name FLIGHT TO PLEASE		
Facility Mailing Address 123 MANUFACTURERS DR		Parent Company Mailing Address 1219 HUMMINGBIRD LANE		
City PIN OAK	ZIP Code 63010	Parent City CONDOR	State AZ	ZIP Code 60555
Facility Contact Person BOB WHITE		Parent Company Contact OODAY BOOKER		Parent Co. Phone 789-555-0666
Phone Number 636-282-6830		Where to Send EIQ in Future (Check One) <input type="checkbox"/> Facility Mailing Address <input type="checkbox"/> Parent Co. Mailing Address		
TOTAL PLANT EMISSIONS FROM LAST EIQ (TONS PER YEAR)				

PM10	SOx	NOx	VOC	CO	Lead	HAPs	PM2.5	NH3	Year of Data
2.39	0.00	0.22	25.54	0.17	0.00	0.00	0.00	0.00	2002

The undersigned hereby certifies that he/she has personally examined and is familiar with the information and statements contained herein and further certifies that he/she believes this information and statements to be true, accurate and complete. The undersigned certifies that knowingly making a false statement or misrepresenting the facts presented in this document is a violation of state law.		Check Amount	
		Check Number	
		Check Date	
Print Name of Authorized Company Representative		Title	
Signature		Date	
		OFFICE USE ONLY	
		Logged In By	Date Received

Emissions Fee: \$ 966.00

Our records indicate your facility is required to obtain a construction permit under 10CSR 10-6.060 but not an operating permit. Based on this information, you are required to submit a completed EIQ once every 5 years and pay an ANNUAL emissions fee based on the emission totals reported in your last EIQ. Actual emissions reported in your last full EIQ were copied to this form and used to calculate your reporting year's emissions fee. If this facility modified its construction permit during the reporting year, then a full EIQ should be submitted.

If your facility does not meet the above requirement and you have received this form in error, please contact the Air Pollution Control Program/Air Quality Analysis Section at (573) 751-4817 or (800) 361-4827. If our records are correct, please pay the annual emissions fee stated above.

Top 10 Basic Facilities by SICs

<u>SIC</u>	<u>No. of Facilities</u>	<u>Descriptions</u>
1422	187	Limestone Mining & Quarrying
3273	124	Ready-mix Concrete Mfg.
2951	67	Asphalt Paving
5191	48	Grain and Fertilizer Suppliers
7261	44	Crematories
2048	34	Animal Feeds
5153	33	Grain Storage & Handling
4953	23	Landfills
8062	23	General Medical & Surgical Hospitals
2752	17	Quick Printing

■ PROs

- Reduces the reporting burden on small facilities.
- Allows more time for quality assurance of data.

■ CONs

- Less current information readily available on small sources.
- Shifts reporting of out of business (OB) or quickly changing facilities to local inspections.

CONCLUSION

In conclusion, APCP believes that implementing this proposal will benefit both state and industry in terms of time saving for emissions reporting and improving emission inventory data quality.

